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Attorney for: Plaintiffs

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

09 1898

LISA LIBERI
and
PHILIP J. BERG, ESQUIRE
and
THE LAW OFFICES OF PHILIP J. BERG
and
EVELYN ADAMS a/k/a MOMMA E
and
LISA M. OSTELLA
and
GO EXCEL GLOBAL

Plaintiffs,

vs.

ORLY TAITZ, a/k/a DR. ORLY TAITZ, a/k/a
LAW OFFICES OF ORLY TAITZ; a/k/a
WWW.ONLYTAITZESQ.COM a/k/a
WWW.REPUBX.COM a/k/a ORLY TAITZ,
INC.
and
DEFEND OUR FREEDOMS
FOUNDATIONS, INC.
and
YOSEF TAITZ
and
THE SANKEY FIRM
and
SANKEY INVESTIGATIONS, INC.
and
NEIL SANKEY
and
JAMES SUNDQUIST
and
ROCK SALT PUBLISHING

CIVIL ACTION NO.

JURY TRIAL DEMANDED

FILED

MAY 4 2009

~~MICHAEL E. KUNZ, Clerk~~
By _____ Dep. Clerk

and :
LINDA SUE BELCHER a/k/a LINDA S. :
BELCHER a/k/a LINDA STARR; a/k/a :
NEWWOMENSPARTY a/k/a :
STITCHENWITCH a/k/a EVA BRAUN a/k/a :
WEB SERGEANT a/k/a KATY a/k/a :
WWW.OBAMACITIZENSHIPDEBATE.ORG :
and :
EDGAR HALE a/k/a JD SMITH; :
and :
CAREN HALE; :
and :
PLAINS RADIO NETWORK, a/ka PLAINS :
RADIO NETWORK, INC. a/k/a PLAINS :
RADIO; :
and :
BAR H FARMS; :
and :
KPRN AM 1610; :
and :
DOES 1 through 200 Inclusive, :
Defendants. :

PLAINTIFFS COMPLAINT

I. PRELIMINARY STATEMENT

NOW COMES, Lisa Liberi, Philip J. Berg, Esquire, the Law Offices of Philip J. Berg, Evelyn Adams a/k/a MommaE, Lisa M. Ostella and Go Excel Global, Plaintiffs by and through the undersigned counsel and brings this Complaint seeking injunctive relief and damages against the Defendants, Orly Taitz a/k/a Dr. Orly Taitz a/k/a Law Offices of Orly Taitz a/k/a Orly Taitz, Inc; Defend our Freedoms Foundation; Yosef Taitz; Neil Sankey; The Sankey Firm, Sankey, Sankey Investigations, Inc., James Sundquist; Rock Salt Publishing; Linda Sue Belcher a/k/a Linda S. Belcher a/k/a Linda Starr a/k/a Newwomensparty a/k/a Stitchenwitch a/k/a Eva Braun a/k/a Web Sergeant a/k/a Katy a./k/a www.obamacitizenshipdebate.org; Edgar (Ed) Hale a/k/a JD Smith; Caren Hale; Bar H Farms; Plains Radio Network, Inc. a/k/a Plains Radio; and KPRN

AM 1610; individually and collectively, for their illegal acts against the Plaintiffs, their staff and their businesses. This is a case that sets forth the facts that Defendants, Orly Taitz a/k/a Law Offices of Orly Taitz a/k/a Orly Taitz, Inc., Defendant our Freedoms Foundation, Inc., The Sankey Firm, Sankey Investigations, Inc., and Neil Sankey, have sent Plaintiff Lisa Liberi's Social Security number and personal data via e-mail in mass mailings, media groups, internationally and to 1000's of undisclosed recipients, requesting the information to be posted on websites across the internet and have been harassing Plaintiff Lisa Liberi, Philip J. Berg, Esquire and the Law Offices of Philip J. Berg. Defendants James Sundquist and Rock Salt Publishing have sent mass e-mailing with Lisa Ostella's home address, phone number and maiden name through the internet to an unknown number of undisclosed recipients slandering and harassing Lisa Ostella and her family and have filed falsified police and law enforcement reports against Lisa Ostella regarding supposed "hacking" of Defendant Orly Taitz, et al websites and PayPal accounts. Lisa Liberi and her husband were also accused of "hacking" and tampering with Defendant Orly Taitz's website and PayPal accounts. Defendants' are well aware it is Orly Taitz, et al who has placed JS Kit software which is a "tracking" and "hacking" software on her Defendant our Freedoms Foundation, Inc. websites and blogs in order to "track" and "hack" individuals and their computers who have visited her websites. Defendant Yosef Taitz has a server in Orly Taitz, et al and his home in order to complete their illegal activities. Defendants' have been slandering Plaintiffs herein, their staff and their businesses; posting libel regarding the Plaintiffs, their staff and their businesses on the internet and through mass mailings on the internet; and harassing the Plaintiffs, their staff and their businesses. Defendants DOES 1 through 200 are Defendants internet providers, phone companies, e-mail providers, streamlines and unknown Defendants who have allowed Defendants', Orly Taitz a/k/a Dr. Orly Taitz a/k/a Law Offices of Orly Taitz a/k/a Orly Taitz, Inc., Defendant our Freedoms Foundation, Inc., The Sankey Firm, Sankey

Investigations, Inc., Neil Sankey; Linda Sue Belcher a/k/a Linda S. Belcher a/k/a Linda Starr a/k/a Newwomensparty a/k/a Stitchenwitch a/k/a Eva Braun a/k/a Web Sergeant a/k/a Katy a/k/a www.obamacitizenshipdebate.org, Plains Radio Network a/k/a Plains Radio Network, Inc. a/k/a Plains Radio and Mr. and Mrs. Hale, to continue their illegal and dangerous behaviors against Plaintiffs, their staff and their businesses. As a result, Plaintiffs, their staff and their businesses have been severely damaged as outlined herein.

II. JURISDICTION AND VENUE

1. This case involves diversity of citizenship and this Court has jurisdiction pursuant to 28 U.S.C. §1332(a).
2. This case further arises under the Constitution and laws of the United States and presents a federal question within this Court's jurisdiction under Article III of the Constitution and 28 U.S.C. § 1331.
3. Venue is proper in this Court under 28 U.S.C. § 1391(b).

III. PARTIES

4. Plaintiff, Lisa Liberi [hereinafter "Liberi"] is an adult individual with a business address of 555 Andorra Glen Court, Suite 12, Lafayette Hill, PA 19444-2531;
5. Plaintiff, Philip J. Berg, Esquire [hereinafter at times "Berg"] is an adult individual with a business address of 555 Andorra Glen Court, Suite 12, Lafayette Hill, PA 19444-2531;
6. Plaintiff, The Law Offices of Philip J. Berg is a law firm, with a staff, owned and operated by Plaintiff Philip J. Berg, with a business address of 555 Andorra Glen Court, Suite 12, Lafayette Hill, PA 19444-2531;

7. Plaintiff, Evelyn Adams [hereinafter at times “Adams”] is an adult individual with a residential address of Route 1, Box 106 BB, Wynnewood, Oklahoma 73098;
8. Plaintiff, Lisa M. Ostella [hereinafter “Ostella”] is an adult individual with a residential address of 2227 US Highway 1, #245, North Brunswick, NJ 08902-4402.
9. Plaintiff Go Excel Global is a Web Communications company owned and operated by Lisa M. Ostella with a business address of 2227 US Highway 1, #245, North Brunswick, NJ 08902-4402;
10. Defendant, Orly Taitz a/k/a Dr. Orly Taitz a/k/a Law Offices of Orly Taitz, a/k/a WWW.ONLYTAITZESQ.COM a/k/a WWW.REPUBX.COM a/k/a Orly Taitz, Inc. [hereinafter “Taitz”] is a licensed Attorney with a business addresses of 26302 La Paz, Suite 211, Mission Viejo, CA 92691 and 29839 S. Margarita Pkwy, Rancho Santa Margarita, CA 92688, and a home address of 31912 Monarch Crest, Laguna Niguel, CA 92677;
11. Defendant, Defend our Freedoms Foundation, Inc. is incorporated as a non-profit organization owned and operated by Defendant Orly Taitz a/k/a Dr. Orly Taitz a/k/a Law Offices of Orly Taitz with a business address of 26302 La Paz, Suite 211, Mission Viejo, CA 92691;
12. Defendant Yosef Taitz [hereinafter “Yosef”] is an adult individual with a home address of 31912 Monarch Crest, Laguna Niguel, CA 92677;
13. Defendant, The Sankey Firm [hereinafter “Sankey Firm”] is owned and operated by Neil Sankey. The Sankey Firm has a business address of 2470 Stearns Street, #162, Simi Valley, California, 93063 and Post Office Box 8298, Mission Hills, California 91346;

14. Defendant Sankey Investigations, Inc. is incorporated in the State of California. Sankey Investigations, Inc. is owned and operated by Neil Sankey and is a private investigation Company. Sankey Investigations has a business address of Post Office Box 8298, Mission Hills, California 91346 and 2470 Stearns Street, #162, Simi Valley, California, 93063;
15. Defendant, Neil Sankey [hereinafter "Sankey"] is an adult individual and owner of The Sankey Firm and with an business address of 2470 Stearns Street, #162, Simi Valley, California, 93063 and Post Office Box 8298, Mission Hills, California 91346;
16. Defendant James Sundquist [hereinafter "Sundquist"], is an adult individual, owner and operator as Director of Defendant Rock Salt Publishing, with a business address of 551 Valley Road, Suite 123, Upper Montclair, New Jersey 07043;
17. Defendant Rock Salt Publishing [hereinafter "Rock Salt"] is a company owned and operated by James Sundquist, as Director with a business address of 551 Valley Road, Suite 123, Upper Montclair, New Jersey 07043;
18. Defendant, Linda Sue Belcher a/k/a Linda S. Belcher a/k/a Linda Starr a/k/a Newwomensparty a/k/a Stitchenwitch a/k/a Eva Brau a/k/a Web Sergeant a/k/a www.obamacitizenshipdebate.org [hereinafter "Linda"] is an adult individual with a home address of 201 Paris Street, Castroville, Texas 78009-4516;
19. Defendant Edgar (Ed) Hale [hereinafter at times "Mr. Hale"] is an adult individual with a residential and business address of 1401 Bowie Street, Wellington, Texas 79095;
20. Defendant Caren Hale [hereinafter at times "Mrs. Hale"] is an adult individual with a residential and business address of 1401 Bowie Street, Wellington, Texas 79095;

21. Defendant, Plains Radio Network a/k/a Plains Radio Network, Inc. a/k/a Plains Radio,] hereinafter at times "Plains Radio"] is a business and owned and operated by Defendants Edgar (Ed) and Caren Hale with a principal address of 1401 Bowie Street, Wellington, Texas 79095;
22. Defendant, Bar H. Farms [hereinafter at times "Bar H" is a business owned and operated by Defendants Edgar (Ed) and Caren Hale with a principal address of 1401 Bowie Street, Wellington, Texas 79095;
23. Defendant, KPRN AM 1610 [hereinafter "KPRN"] is a business owned and operated by Defendants, Edgar (Ed) and Caren Hale with a principal address of 1401 Bowie Street, Wellington, Texas 79095; and
24. Defendants, DOES 1 through 200 are unknown Defendants who provide the internet access, streaming, e-mail, broadcasting, etc., for Plains Radio, KPRN, Bar H Farms and Mr. and Mrs. Hale.

IV. FACTUAL ALLEGATIONS RELATING TO ORLY TAITZ a/k/a DR. ORLY TAITZ a/k/a LAW OFFICES OF ORLY TAITZ a/k/a WWW.ONLYTAITZESQ.COM a/k/a WWW.REPUBX.COM a/k/a ORLY TAITZ, INC., DEFEND OUR FREEDOMS FOUNDATION, INC. and YOSEF TAITZ

25. In or about November 2008, the name Orly Taitz appeared as filing legal complaints in Sacramento, California on behalf of Alan Keyes and other Plaintiffs and against the California Secretary of State and other Defendants regarding the Barry Soetoro a/k/a Barack H. Obama citizenship issues¹. Ironically, Taitz

¹ *Ambassador Dr. Alan Keyes, et al. v. California Secretary of State Debra Bowen, et al.* Superior Court of the State of California for the County of Sacramento, Case No. 34-2008-80000096-CU-WM-GDS, which was recently dismissed.

plagiarized the work of Philip J. Berg, his Assistant Lisa and his law practice, Law Offices of Philip J. Berg.

26. Orly Taitz set up the business name of Defend our Freedoms Foundation, Inc. as a non-profit Organization with a Federal Tax Identification number of 26-4328440. However, when you attempt to verify the Federal Tax Identification number it comes back invalid².
27. Taitz had a website at drorly.blogspot.com, which did have some nefarious functions and Taitz authorized those functions. At this time, Ostella assumed it was because Taitz did not understand the internet. There was a third [3rd] party program added to drorly.blogspot.com. This program was collecting information from everyone who was visiting and posting at Taitz website (drorly.blogspot.com) and transferring the individuals' private data to an unknown server. Taitz was well aware of these functions as she authorized them and had the head webmaster install the software on December 24, 2008.
28. The data transfer took place via a java script program plus a put command that enabled FTP transfer. The java program is what caused trouble with people using Taitz's website located at drorly.blogspot.com. Most computers are set up with security firewalls that do not allow easy data collection.
29. Ostella purchased and owned the defendourfreedoms.us and defendourfreedoms.org, websites and she maintained them on the server that she (Ostella) paid for. Ostella allowed Taitz to use said websites. Ostella supported Taitz and has always been involved with politics, campaigns and causes. So when Ostella saw the antics with the java script program on the other blog (drorly.blogspot.com),

² <http://www.melissadata.com/lookups/np.asp?zip=26-4328440&submitI=Submit>

and it was never clear on how much Taitz realized was going on, Ostella took Taitz over here to use Ostella's accounts. All of the DefendOurFreedoms domain names were and are on Ostella's web accounts.

30. DefendOurFreedoms.org, owned by Lisa Ostella was and is hosted at Ostella's server. It is a stand-alone server on rack rental at HE.Net. Ostella had and has full access to this server and no other accounts are on this server but hers. Ostella verified her IP logs to ensure the website was not "hacked". The IP Address logs show every IP address, which is a computer's identification that entered the website and/or server. There has never been any other IP addresses that have appeared on the IP logs other than Ostella's. Hence, the website and/or server have never been "hacked".
31. As for DefendOurFreedoms.us, that was hosted at GoDaddy under Ostella's reseller account. This domain did not point to a website, it pointed to a blog. Specifically, it pointed to QuickBlogcast. This is very important to understand. A blog is not a website. The domain points to a database label. If the blog had been "hacked", someone would have had to break into GoDaddy's database files and know what customer number the database files was under. This would have compromised a number of other accounts with more damage other than a change in the e-mail address. GoDaddy would have had to issue a notification to all customers. Of course, GoDaddy never issued such a notification because the blog was never "hacked".
32. None of the DefendOurFreedoms website were ever hacked or sabotaged, as Taitz claimed. Being unable to access a website due to network latency does not equal

“hacking”. Traffic, congestion, line repairs affect network flow and all can always be checked on the Internet Traffic Report³.

33. Another webmaster who goes by “creativeogre” and Ostella called Taitz and explained to Taitz her websites had never been hacked.

34. On or about March 9, 2009, another issue arose with Taitz and her PayPal account. Taitz had volunteers with access to the coding of her PayPal account on her blogs. One of Taitz’s volunteers or Taitz herself changed Taitz e-mail address associated with her PayPal account from orly.taitz@gmail.com to orly.taitz@gmail.org.

35. Bob Stevens, Taitz’s Head Webmaster created four [4] e-mail accounts for Taitz. Taitz was supplied all her e-mail accounts which included, amongst others, dr.taitz@gmail.com. Despite knowing this was her own e-mail address, Taitz sent a mass e-mailing out with the below statement and posted the statement on her website, knowing it to be false.

BREAKING AND ENTERING INTO MY PAYPAL ACCOUNT

Breaking and entering into my Paypal account

There is no limit or extend to which Obama's thugs will go to hurt people. As you know, I have a DefendOurFreedom's foundation, that helps me to pay for legal actions, for traveling to different states and presenting the case to Attorney Generals, U.S attorneys FBI and legislators, presenting all the information to them, so that criminal proceedings and Judicial hearings can be conducted on the issue of Obama's eligibility for presidency and related illegal activity. Without donations I cannot do that. Somebody has intermittently broken and entered into my pay pal account and changed the e-mail address. My address for paypal is dr.taitz@gmail.com. They changed it to orly.taitz@gmail.org at another occasion e-mails were sent to people telling them to give donations to dr.taitz@gmail.com. They were making up accounts in order to divert donations from my foundation. Due to the problems with PayPal, I would ask you to send donations by mail to Dr. Taitz, ESQ. 26302 La Paz ste 211 Mission Viejo CA 92694

Posted by Dr. Orly Taitz at 2:42 PM 10/06/09
Categories: Uncategorized

36. As a result, Taitz was not receiving her donations. Donations received were rejected by PayPal as the e-mail address was incorrect and no such e-mail address

³ <http://www.internettrafficreport.com>

existed. Since the e-mail address did not exist, PayPal rejected the donations and sent them back to the contributors. Hence, the donations were not stolen or misdirected as Taitz claimed, which Taitz was well aware.

37. Despite the fact Taitz was well aware her websites and PayPal accounts had **never** been “hacked” or tampered with, on or about April 2, 2009, Taitz wrote to the U.S. Supreme Court Justices⁴ seeking help in an investigation regarding a criminal complaint she had filed with the Federal Bureau of Investigations regarding hacking into her websites and tampering of her PayPal accounts, and other things. Taitz sent this same letter to the Secret Service and other Governmental Law Enforcement Agencies. Taitz was aware the information she gave to the Federal Bureau of Investigations was false and she was well aware she was filing a false report.

38. As a result of the false report made by Orly Taitz to the Federal Government, Ostella informed Taitz that she must clear up the false reports or Ostella was removing Taitz from her websites and server. Taitz refused to clear this matter up and refused to retract her falsified police reports. When Taitz refused to clear up this report, Ostella told Taitz she had to move her sites. Taitz asked Ostella to give her thirty [30] days so she would be able to find a new host.

39. Instead of Taitz locating a new server, she gave an interview to World Net Daily⁵ on April 4th, 2009 elaborating on her scheme to mislead the public and law

⁴ A copy of the letter Orly Taitz sent to the U.S. Supreme Court, which was posted by Orly Taitz on April 2, 2009 at 4:20 p.m. can be located at: <http://defendourfreedoms.net/2009/04/02/open-letter-to-the-supreme-courtrequest-of-cooperation-with-the-fbi-investigation.aspx>

⁵ Orly Taitz interview can be found at <http://www.worldnetdaily.com/index.php?fa=PAGE.view&pageId=93832>

enforcement into believing her websites and PayPal accounts were “hacked” and “sabotaged”. Again, Taitz was well aware none of these events took place.

40. Although Ostella continued informing and explaining to Taitz her websites had never been “hacked”, Taitz continued to spread the falsified story. As a result, Ostella told Taitz she had to immediately move her sites.

41. Taitz found a person by the name of Jesse Smith who was to be her new web host. She authorized Ostella to transfer the domains to him. Jesse Smith first contacted Ostella on April 9, 2009. Ostella told him to initiate the transfer. Jesse Smith started the initiation on April 10, 2009 through Network Solutions. Ostella accepted the transfer request and the transfer process started.

42. Now, remember, the site was not a website. It is a blog. The domain pointed to a database label. Normally, when a domain is transferred from a website, the domain just switches from the one site to the new site smoothly. It will leave the old site still showing; but with the virtual host name. In order to move a blog site, which is a database, the account would delete when the transfer activates. To protect all the data, Ostella moved the account onto DefendOurFreedoms.Net, then unlocked the domain and authorized the transfer. For whatever reason, this outraged Taitz and Taitz accused Ostella of being defiant.

43. On April 12, 2009, Taitz went on the Evil Conservative Blogcast⁶ and told the audience that Ostella had threatened her and altered the focus of her story onto the PayPal account.

⁶ <http://www.evilconservativeonline.com/2009/04/orly-taitz-update-site-moving.html>

44. For protection purposes, Ostella locked the website access of all of her (Ostella's) websites. Ostella changed the PayPal script in the donations button to reflect her own account and removed Taitz's accounts from the site. Ostella placed notifications on all her webpages that the sites were no longer Taitz's Defend our Freedom Foundation, Inc. and Ostella posted the following links to ensure people understood Taitz's sites were never "hacked".

- **Understanding the Internet 101**

<http://defendourfreedoms.net/2009/04/12/understanding-the-internet-101.aspx>

45. Once Ostella posted the above, she received the following Ceize [sic] and Desist from Taitz, which was untrue. Ostella at all times owned the domains and servers that the domains were located.

"Ceize and Desist

04.13.09.

Ms. Ostella,

This is a Ceize and Desist Letter, advising you to stop immediately operation of sites and shut down DefendOurFreedoms.net; DefendOurFreedoms.US; DefendOurFreedoms.Org, and DefendOurFreedoms.Com and any other relating sites that you have been operating after I requested transfer. You have used those sites for defamatory purpose of me and my foundation and you have used my likeness and my material without my permission. If you do not shut down above sites immediately, further actions will be taken.

Sincerely,

Dr. Orly Taitz Esq

26302 La Paz ste 211

Mission Viejo Ca 92691"

46. Moreover, Taitz, placed JS Kit software which is a "tracking" and "hacking" software on her Defend our Freedoms Foundation, Inc. websites and blogs, this softwith the exception of the DefendourFreedoms websites owned by Lisa Ostella, in

order to “track” and “hack” individuals and their computers who have visited her websites. Defendant Yosef has a server in Taitz, and his home in order to complete their illegal activities.

47. Unfortunately, Liberi’s computer was infected with Taitz’s JS Kit Software and a remote server was placed on Liberi’s home computer by accessing Taitz website.

48. Taitz began changing her story to focus on “hacking” of her PayPal account, even though it never happened. Taitz was literally telling people that her PayPal account was “hacked”, knowing this to be false. In fact, there is no way Taitz’s PayPal account could have been hacked. PayPal’s servers that hold individuals’ private data are not connected directly to the internet. There are servers in between. So the server an individual logs into in order to access their PayPal account, is not the same server that houses the information. If someone was able to break into that system, PayPal would have had to notify all customers of a breach and shut all processes down to investigate. Taitz literally had people thinking that her e-mail address was changed from within the PayPal account, again knowing this information to be false.

49. Taitz **never** launched an investigation with PayPal in reference to her “hacking” allegations. Instead, Taitz made blatant statements saying money was stolen out of her account. Again, the entire time knowing this information was false.

50. Because of Taitz false statements regarding her PayPal account being “hacked”, Ostella posted the following:

- **Understanding the Internet 102 – PayPalGate**

<http://defendourfreedoms.net/2009/04/14/understanding-the-internet-102---PayPalgate.aspx>

51. The change was in the e-mail address on the blogsite. Originally, the PayPal donate code on the blogsite was in an encrypted script that PayPal makes available for copying and pasting into blogs and websites. But GoDaddy made some updates in the design in **February 2009**. The updates didn't function with the PayPal script encryption. See the below e-mail received from GoDaddy.

Subject: Script Issue With Quick Blogcast
From: "Andrew" <achristensen@godaddy.com>
Date: Tue, April 21, 2009 6:40 am
To: info@goexcelglobal.com

On **February 11, 2009**, Lisa, was advised that the PayPal button links do not work on the sidebar within the Quick Blogcast.

Andrew S.
Team Sapphire
Customer Care Center

52. Taitz is no stranger to falsifying stories and falsely claiming to be the victim of "hacking" of her websites. On December 12, 2009 Taitz and Bob Stevens, Taitz Head Webmaster, began telling people that "Obama thugs" had her business/dental site, drtaitz.com, shut down. They wanted this information immediately posted on the blogs. Ostella stopped the posting of this information by looking up the domain and finding Taitz's prior host data. In short, what Taitz had done was switched her own domain off the website. Taitz told Ostella she (Taitz) was signing up for a web traffic program. Taitz told Ostella she (Taitz) was going to give Ostella access to get her domain back and Ostella would be her new hired webmaster for Taitz's dental websites. Ostella was never given access. Taitz's dental websites are up and running and Ostella is unsure who Taitz's webmaster is.
53. On April 12, 2009, Ostella received the following e-mail containing false and incomplete information further slandering Ostella. This e-mail was sent to an

unknown number of undisclosed recipients as well as carbon copied to Ostella and the Chicago FBI:

----- Original Message -----

From: Orly Taitz

To: [chuckolb](#)

Cc: [Lisa Ostella](#) ; [Chicago FBI](#)

Sent: Sunday, April 12, 2009 2:55 PM

Subject: Re: IMMEDIATE / Dr. Orly Taitz / Redirect - [defendourfreedoms.net](#) / Phil - [therightsideoflife.com](#) - the Conservative Sanctuary

no, things are not right it is being investigate by the FBI. I cannot post anything at the moment, Lisa Ostella, web master, has blocked me out of my own blog and refuses to give me codes for my own blog

Orly Taitz DDS Esq
26302 La Paz ste 211
Mission Viejo Ca 92691

29839 S. Margarita Pkwy
Rancho Santa Margarita Ca 92688
ph. w 949-586-8110 c-949-683-5411
fax 949-586-2082

54. It was also discovered Taitz had authorized placement of JS Kit Software on all her Defend our Freedoms Foundation, Inc. websites and blogs. Again, this does not include the DefendourFreedome websites owned and operated by Ostella. JS Kit software is tracking software used in "hacking" websites and personal computers. In the JS Kit software is a function that places remote servers on individual and company computer systems in order to allow the person using JS Kit software, in this case, Taitz, Yosef and other unknown individuals on their behalf to illegally enter the individuals and company computers to steal and transfer data. This remote server function was located on Liberi's computer.
55. Yosef, Taitz husband and Taitz have implemented their own server in their home located in Laguna Niguel to utilize the "tracking" and "hacking" of individual and company computers who have visited Taitz websites and blogs. Yosef is assisting his

wife, and their companies, Orly Taitz, Inc., Defend our Freedoms Foundation, Inc., and Taitz, in her illegal activities. Hence, it is not Plaintiffs Ostella or Liberi “hacking” Taitz and/or Defend our Freedoms Foundation, Inc. websites, blogs and/or PayPal accounts, it is Taitz, her husband Yosef and other unknown named individuals on their behalf who are “hacking” the computers of the Plaintiffs and other individuals and companies who have visited any of their websites and/or blogs.

56. On or about April 12, 2009, Berg received an e-mail from Taitz stating he was to “Ceize and Desist” [*sic*] from using Taitz’s Quo Warranto, which Taitz claimed was sent to Berg inadvertently. In this same e-mail, Taitz made false allegations claiming his (Berg’s) Paralegal, Lisa Liberi had an extensive criminal record involving amongst other things identity theft. Taitz went on further in her e-mail to Berg that Liberi’s husband was currently on parole and he had set up two (2) accounts accepting credit cards on Berg’s “charitable foundation”, again all of which was falsified and fabricated by Taitz. Taitz in her e-mail stated as an officer of the Court she was obligated to send the information to the “FBI”, Attorney General of California and San Bernardino County District Attorney since Lisa Liberi had an eight [8] year conviction in San Bernardino County, California. Taitz in her e-mail informed Berg that she believed that Berg, as an Officer of the Court, as well and a former Assistant Attorney General of Pennsylvania, should join her in issuing a joint Complaint and demand for investigation from the authorities. Taitz then forwarded the e-mail addressed to Berg to an undisclosed number of recipients.

57. Liberi then received an e-mail from Mr. Hale claiming Lisa Liberi was stealing money from Taitz’s PayPal account. Mr. Hale’s e-mail was forwarding an e-mail sent out by mass mailing by Taitz stating, “*I also received information that her*

husband, who is currently on parole, is an owner of 2 of accounts, accepting credit cards on your charitable foundation web site." At all times, Taitz and Mr. Hale were well aware this information was false and untrue.

From: **Ed Hale** <ed@barhfarms.net>
Date: Mon, Apr 13, 2009 at 9:58 PM
Subject: Fwd: Ceize and Desist, demand to file a joint FBI complaint
To: Lisa Liberi <lisaliberi@gmail.com>

Hide quoted text -

"Well, I sure hope that you will enjoy your time in prison. We now have you as we ahve undercover where you diverted funds from Dr Orly to your website. We have had 2 people come forward with PayPal reciepts proving you are a thief. Now me and Plains radio have been proven right. You and your whole bunch will wind up in jaib. This is a great day for Plains Radio and Ed Hale."

----- Forwarded Message -----

From: "Orly Taitz" <dr_taitz@yahoo.com>
To: "mark westmann" <mwestmann13@gmail.com>, "Ed Hale-PlainsRadio" <barhfarms@gmail.com>
Sent: Monday, April 13, 2009 11:01:25 PM (GMT-0600)
America/Chicago
Subject: Fw: Ceize and Desist, demand to file a joint FBI complaint

Orly Taitz DDS Esq

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Mission Viejo Ca 92691

29839 S. Margarita Pkwy
Rancho Santa Margarita Ca 92688

ph. w 949-586-8110 c-949-683-5411
fax 949-586-2082

--- On Sun, 4/12/09, Orly Taitz <dr_taitz@yahoo.com> wrote:

From: Orly Taitz <dr_taitz@yahoo.com>
Subject: Ceize and Desist, demand to file a joint FBI complaint
To: "Phil J Berg Esq (pvt)" <PhilJBerg@gmail.com>
Cc: "Orly Taitz" <dr_taitz@yahoo.com>
Date: Sunday, April 12, 2009, 10:01 AM

04.12.09.

Mr. Phillip Berg,

"this is to inform you that a few days ago I have forwarded my quo warranto pleadings to Mr. John Hemenway, since he agreed to be my local co-counsel in Washington DC. This was a confidential communication and Mr. Hemenway stated, that mistakenly he has forwarded those pleadings to you. Shortly thereafter you have sent a press release, stating that you will be filing Quo Warranto action. This is a Ceize and Desist letter, demanding that you do not use my pleadings and confidential information in any way, shape or form, as you received those in error without my authorization.

Additionally, I received information from a licensed Private investigator, with 20 years of experience with Scotland Yard and 12 years of experience in US, that your paralegal Lisa Liberi has an extensive criminal record, involving fraud, forgery of documents and identity theft. See attached file. I also received information that her husband, who is currently on parole, is an owner of 2 of accounts, accepting credit cards on your charitable foundation web site. As an officer of the court I am obligated to forward this information to the authorities: FBI, Attorney General of California and San Bernardino County Distict Attorney, since Lisa Liberi had a 8 year conviction in San Bernardino County, California. I believe that you, as an officer of the court, as well and a former Assitant Attorney General of Pennsylvania, should join me in issuing a joint complaint and demand for investigation from the above listed authorities. Dr. Orly Taitz Esq"

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58. It should be noted, Berg does **not** have a charitable foundation website. He does have a website with a donation button which allows people to donate one (1) of two (2) ways, PayPal or by a separate credit card company, which Berg is the only party with access.

59. Moreover, Liberi has nothing to do with the web mastering of his (Berg's) website, Taitz website or any other website. The coding for the donate buttons and the accounts which donations go into are all done by a third party webmaster and is all traceable.

60. Berg never received the "supposed" Quo Warranto Taitz is referring to above, nor has he seen it. However, what Liberi received from Allan Edward Buck, was a Writ of Mandamus and a Writ of Quo Warranto that he himself had drafted and did all the work on. If this is what Taitz is spreading around, it is **not** her work, but yet the work of another party.

61. Plaintiffs then learned Orly Taitz had people go onto among others, Berg's website at obamacrimes.com, download all the briefs investigated and prepared by Berg and his assistant, copy the contents and Taitz then filed the briefs in Court claiming the work to be hers, again which is plagiarism of Berg's and his assistant's work, which is owned by the Law Offices of Philip J. Berg.

62. On or about April 14, 2009, Liberi received an e-mail from a third party that contained a post on Plains Radio owned by Mr. and Mrs. Hale⁷. The post was made by Defendant Katy and states she received an e-mail from Taitz stating the following. This same e-mail was also sent to an unknown number of undisclosed recipients:

Dr. Orly's site has been taken over by Obots!! E-mail from Orly

"This is an e-mail I recieved from her this afternoon:

Katy"

"This is a nightmare. I had hacking into my PayPal account. (see dossier #5 in attachment), the e-mail address on my PayPal account was changed, so I would not be able to get donations. It was reported by a number of donors and I have filed a complaint with the FBI. My blog was set up by a volunteer Lisa Ostella. She is the web master and

⁷ <http://pub29.bravenet.com/forum/2442810129#bn-forum-1-1-2442810129/8/1006820/show>

she has the codes for the blog. She demanded that I take back my complaint to FBI, claiming that the change of e-mail address was done by a volunteer by name Fran, that she banned Fran from the site, that it took care of the problem and I need to take back my complaint of hacking with FBI, as it gives her, as a web master a bad name. I refused to do so, stating that it is a legitimate complaint, I want them to investigate. At that time she stated that I will need to get my blog off her server, if I don't take back the FBI complaint.

I found somebody else to host the blog, however according to volunteers she never forwarded the release and the codes to the platform company Go Daddy, she locked me out of my own foundation site and refuses to give me the access codes. She has posted a defamatory statement, claiming that I authorized hacking into my own account and that I made bogus claims. This is totally ridiculous in light of the fact that I have statements from the donors and I lost donations. The FBI agent in charge of this investigation is Nathan Le, Orange county, CA, FBI, cyber crimes unit, phone 714-245-5328; 310-710-3459.

Orly Taitz DDS Esq

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63. Again, Taitz was aware all this information was false. Ostella is a Webmaster by trade, Taitz was maliciously slandering and posting libel about Ostella to punish and harm Ostella for telling the truth, which has effected Ostella's company, Go Excel Global.

64. On or about April 17, 2009 at approximately 9:31 a.m. Taitz sent out a mass e-mailing of slander and libel pertaining to Liberi, Ostella, Berg and the Law Offices of Philip J. Berg. Liberi received an e-mail which contained Taitz Dossier No. Six (6) which was nothing more than a vicious attack on Ostella and Liberi. Taitz fabricated false allegations about both Ostella and Liberi. Taitz, gave personal identifying information regarding Liberi including her entire Social Security. Taitz made many false statements including but not limited to the following: Ostella locked Taitz out of her website instead of transferring the access codes and domains; Ostella posted

bizarre defamatory statements that Taitz authorized hacking into her own account; Taitz claimed she received reports that some defamatory comments were made under alias usually used by Lisa Liberi, assistant for Attorney Philip J. Berg; Taitz insinuated Ostella was taking monies donated to her; Liberi had an extensive criminal record going back to 1990; Liberi, among other things, engaged in falsification of police reports, manipulation of credit bureau reports; counterfeiting of court documents; Liberi had Twenty-One Thousand [\$21,000] Dollars per month in restitution; several sources confirmed that Liberi lives in NM; they confirmed her date of birth and appearance as matching the ones on file with the San Bernardino, CA district attorney; Liberi launched vicious attacks against Taitz and then states Liberi disagreed with her and this was the vicious attack. The list goes on. Dossier No. 6 by Taitz own admission was an open letter posted on the internet and forwarded to 26,000 outlets of US and international media. In addition, Taitz sent this e-mail to an unknown number of undisclosed recipients asking them to post the information on their website. Again, included in this was Liberi's full Social Security number that Taitz obtained without a permissible purpose from Defendants, Neil Sankey, The Sankey Firm and Sankey Investigations, Inc. Moreover, Taitz sent this Dossier No. 6 to Attorney General Eric Holder; Solicitor General Elena Kagan; Director of FBI Robert Mueller; FBI Cyber Crime division, Orange County CA. Officer Nathan Le; Director of Secret Service Mark Sullivan; Chief of Security of the Supreme Court, Officer Christine Giaccio; Chief Justice of the Supreme Court John Roberts; and Legal Counsel to the Chairman of Joint Chiefs of Staff Admiral Mullen, Captain Crawford. Taitz was well aware this information was false, and it was illegal to transmit a third (3rd) parties personal identifying information, including their Social

Security number which Taitz had absolutely no permissible purpose to obtain; distribute via the internet, by e-mail and posting a person's private confidential information on websites. **A copy of Taitz Dossier No. 6 will be provided to the Court; with a request that it be placed "under seal".** Taitz also posted this on her website at Defend our Freedoms.⁸ Below is only one of the many e-mails Taitz sent on this date

-----Original Message-----

Date: Fri, 17 Apr 2009 09:10:41 -0700
 From: dr_taitz@yahoo.com
 Subject: More explosive information dossier #6
 To: amccarthy@nationalreview.com; amy.chozick@wsj.com; ken@jhelp.com; backon@vms.huji.ac.il; shelljbaker@aol.com; johnbatchelorshow@gmail.com; mbelcher72@yahoo.com; beesba@aol.com; talkradio@live.com; tammyblog@yahoo.com; heytammybruce@yahoo.com; sean@webm.com; charenmail@cox.net; pchesler@phyllis-chesler.com; chuck.todd@nbcuni.com; info@hillaryclinton.com; clockhead@sfchronicle.com; nocompromisewhenyoureright@gmail.com; evil@evilconservativeonline.com; john@gopsenators.com; jrlc@optonline.net; jric@optonline.net; jric@earthlink.net; acoulter@worldnetdaily.com; carol@harrismedia.com; darlagdawald@yahoo.com; dickmorris@dickmorris.com; jdooley@honoluluadvertiser.com; drudge@drudgereport.com; editor@americanthinker.com; editor@haaretz.co.il; elouis@nydailynews.com; gdescobar@aim.com; alisia.essig@mail.house.gov; eugenerobinson@washpost.com; eva@dennisprager.com; jfarah@wnd.com; joel.fishman@gmail.com; david.freddoso@gmail.com; dfrum@aei.org; mhgintn@comcast.net; kyeoj@mchsi.com; GaynorMike@aol.com; patrickgibsonmail@gmail.com; glenn.simpson@wsj.com; jonahnr@aol.com; agrobman@nj.rr.com; Patrick_Guinn@coburn.senate.gov; mh1690@hotmail.com; barhfarms@gmail.com; author@victorhanson.com; khassett@aei.org; hemingway@nationalreview.com; hhewitt@hughhewitt.com; Brannon@worldviewweekend.com; churt@nypost.com; ymibrahim@gmail.com; info@ap.org; editor@israelinsider.com; Gregg.Jackson@gmail.com; jhood@johnlocke.org; jhorowitz@observer.com; jim.manzi.nro@gmail.com; producer@infowars.com; bryant.jordan@military-inc.com; roger@aim.org; kevin@daynet.org; kincaid@comcast.net; jawaraking@yahoo.com; jklingshoff@aol.com; ck@charleskrauthammer.com; msk@cis.org; lkudlow@kudlow.com; comments.kurtz@nationalreview.com; devvyk@earthlink.net; stevenlaib@sbcglobal.net; MLANGBERT@NYC.RR.COM; larry.king.live@cnn.com; letters@cetimes.com; letters@macleans.ca; letters@msnbc.com; letters@nationalreview.com; letters@oeregister.com; letters@sun-sentinel.com; letters@washpost.com; marklevin.show@citcomm.com; y Levin@eppc.org; elrushbo@eibnet.com; david@davidlimbaugh.com; LINDABENT@aol.com; klopez@nationalreview.com; emahtesian@politico.com; malzbergtalk@gmail.com; marc@webservicesmedia.com; McGrewMX@aol.com; doug@kabc.com; vicmord2001@yahoo.com; nate.fredman@foxnews.com; nightly@nbc.com; today@nbc.com

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⁸ <http://216.221.102.26/blogger/post/Dissier6.aspx>

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Dossier #6 new.doc



8960K [View as HTML](#) [Download](#)

65. April 13, 2009, Taitz was on a blog talk radio station, The Dame Truth⁹, which is an internet blog talk radio program. The entire time Taitz was on the air she did nothing but slander Liberi with the above referenced information.
66. Taitz then posted on her website Defend our Freedoms:¹⁰ “More on Lisa Liberi, contact her probation officer in Santa Fe New Mexico 505-827-8627. She is not allowed to be anywhere near other people's credit cards, By Orlytaitz April 17, 2009”
67. On April 18, 2009, Taitz posted further slander and libel about Ostella and Liberi, on her website, Defend our Freedoms¹¹:

Dr. Orly Taitz Esquire

Defend Our Freedoms Foundation 26302 La Paz ste 211, Mission Viejo CA
92691. e-mail: dr_taitz@yahoo.com

« [Key witness in presidential passport case fatally shot from Field McConnell](#) »

Every day I get such evidence of missing or misdirected funds

“Every day I get such receipts, showing that my former web master Lisa Ostella (posts under name Calpernia) has redirected donations to herself, to her e-mail address. Currently, as this was uncovered, she created new web sites Defend our freedoms .org, .net and continues the scheme by making those sites similar to my old ones and using the foundation name to steal more donations. She created a visa donation site with her e-mail account Go Excell Global, underneath she posted a PayPal button showing my foundation Defend Our Freedoms (without my consent) and my e-mail address (without my consent) to look as if she is still connected to me and my foundation. even though all ties with

⁹ <http://blogtalkradio.com/My-Two-Cents>

¹⁰ <http://216.221.102.26/blogger/post/More-on-Lisa-Liberi-contact-her-probation-officer-in-Santa-Fe-New-Mexico-505-827-8627-She-is-not-allowed-to-be-anywhere-near-other-peoples-credit-cards.aspx>

¹¹ <http://www.orlytaitzesq.com/blog1/?p=119>

her were severed a couple of weeks ago, when I found out about this scheme and I closed the Pay Pal account completely. Any person, whose donations were stolen by Lisa Ostella aka Lisa Current aka Calpernia is asked to report this to his local police or sheriff's department. As I found out, she appears to be connected to Lisa Liberi, who is still working for attorney Phillip Berg. Please see my dossier #6, Lisa Liberi aka Lisa Richardson aka Lisa Courvelle has a long criminal record, that includes grand theft, forgery of documents, forgery of seal, falsification of police reports and credit statements, where financial institutions were defrauded out of thousands of dollars. She claims to be a different Lisa Liberi, living in PA, however she lives in NM and her probation officers are Joanne Martinez 505-827-8627 and Dawn Helling (not sure about spelling) 505-476-2359."

68. Taitz then set-up another blog¹² where she was slandering and posting libel about Ostella. Taitz set up the blog, orlytaitz.com and posted the following:

« [Form to become a Military Plaintiff](#)
[Important Notice regarding donations sent to DefendOurFreedoms US blog or ORG site.](#) »

Don't be fooled

"My former web master Lisa Ostella has created an account that she called Defend Our Freedoms Network and is soliciting donations, praying on unsuspecting readers that would not notice the difference between Defend Our Freedoms Foundation and Defend Our Freedoms Community. Please notice, your donations there will not go to the foundation, they will go to her personal bank account, connected to her personal e-mail address GoExcellGlobal. She posted underneath a PayPal logo with my e-mail address, however I have closed the pay-pal account. If you want to give donations to the Defend Our Freedoms Foundations, please, mail them to Defend Our Freedoms Foundation 26302 La Paz ste 211, Mission Viejo CA 92691"

This entry was posted on Saturday, April 18th, 2009 at 5:27 pm and is filed under [Other Criminal or Suspicious Activities](#). You can follow any responses to this entry through the [RSS 2.0 feed](#). You can [leave a response](#), or [trackback](#) from your own site."

69. On April 20, 2009, Mr. Hale had a radio show on at 9:00 p.m. Mr. Hale's Guest was Orly Taitz. Orly Taitz did nothing but slander Ostella and Liberi on Mr. Hale's radio show with the false allegations outlined above. Mr. Hale then went on falsely stating Lisa Ostella and Lisa Liberi were one and the same person and she was a criminal.

¹² <http://www.orlytaitzesq.com/blog1/?p=71>

70. On April 21, 2009, Taitz posted the following slander and libel against Ostella, Liberi, Berg, the Law Offices of Philip J. Berg and Adams on her website¹³:

"Dear Mr. Barrs,

I have reported the matter to the Sheriff's department and FBI . See below the receipt for the police report with the name and phone number of the detective. The name of the FBI agent is John Haas- supervisor of the cyber crimes unit 714-542-8825. Please spread the word and give everybody the new web address for the Defend Our Freedoms Foundation, which is <http://www.OrlyTaitzEsq.com>

Please post this web address in as many blogs and sites as you can, so it will be picked up quickly by different search engines and can be seen by all my readers. I have closed my pay pal account and did not receive any pay pal or visa donation since 04.11.09. If you or anybody else has given any donations after this date, using pay-pal, visa, MasterCard, American Express and so on, believing that these donations were received by the Defend Our Freedoms foundation, please demand a refund and report it to the Sheriffs department, FBI and IRS as funds stolen from the non profit organization. I have sent a Cease and Desist letter to Ms. Lisa Ostella, demanding that she forward to me the access codes for the domains and the e-mail address list of the readers and stop fraudulently operating under the name DefendOurFreedoms and stop drawing financial profit from the Defend Our Freedoms name. I have also sent a Cease and Desist letter to Evelyn Adams aka Momma E, talk show host David Levin and other parties who are fraudulently advertising on the foundation website and drawing profit from it or from reader lists given or sold to them by Ms. Ostella. Ironically Ms. Ostella has accused me of collecting information on the readers. In reality I did not have any such information and could not reach most of the readers, aside from ones whose names were in my dr_taitz@yahoo.com e-mail account. Ms. Lisa Ostella is the one, who collected names and e-mail addresses and she is currently fraudulently sending e-mails to these readers using DefendOurFreedoms name. If you get such e-mail, please demand that she immediately stop this practice and forward the list to me, as the president of the foundation.

My primary goal is to expose all the fraud committed by Obama and removing him out of office as an usurper, litigation against Ms. Ostella is secondary. I also need to get full information in regards to full damage to the foundation and me, stemming from actions of Ms. Ostella and parties that patronage her site and are aiding and abetting her.

I, also, sent an e-mail with dossier #6 to Mr. Phil Berg, advising him of lengthy criminal record of grand theft, forgery, forgery of seal and other related crimes, committed by Ms. Lisa Liberi, his paralegal and assistant, who reportedly was managing his fund raising efforts. I believe Mr. Berg should not be using a person with such past in his fund raising efforts and legal practice and should issue a statement advising the donors and supporters, that Ms. Lisa Liberi is no longer employed by him or his foundation and that he is reviewing all donations and all legal records handled by Ms. Lisa Liberi. I believe the donors to Mr. Berg foundation should get assurances that their donations were used for litigation and the cause and not to reimburse victims of Ms. Liberi's prior schemes, reported to add to \$21,000 per month.

Sincerely,

Dr. Orly Taitz, ESQ"

04.21.09.

¹³ <http://www.orlytaitzesq.com/blog1/?p=195>

71. Unfortunately, Taitz continued sending out the above false statements and her falsified Dossier No. 6, every day since to websites and undisclosed recipients requesting the posting of the information along with her requests for everyone out there to contact the FBI, the Orange County Sheriff's Department, a probation officer in Santa Fe, New Mexico and report this information. It was nothing more than harassment of Liberi, Ostella, Berg and the Law Offices of Philip J. Berg.
72. Taitz distributed this information including Liberi's full Social Security number, date of birth, residency, etc. to in excess of Two Hundred and Fifty Thousand [250,000] individuals and businesses.

V. FACTUAL ALLEGATIONS RELATING TO DEFENDANTS' NEIL SANKEY, THE SANKEY FIRM AND SANKEY INVESTIGATIONS

73. Plaintiffs incorporate by reference all of the foregoing allegations as if set forth herein at length.
74. Defendant Neil Sankey is a licensed private investigator and owns and operates the Sankey Firm and Sankey Investigations, Inc. Sankey is aware aware of the State and Federal laws pertaining to disclosure of third party information: the posting of Social Security numbers; the disclosure of Social Security numbers and personal identifying information; the permissible purpose requirement before disclosing any

parties Social Security number, date of birth, where they reside or any personal information at all; the transmittal of Social Security numbers; State and Federal laws against endangering, harassing, threatening and attempting to destroy any person's life and/or reputation.

75. Despite knowing these very laws, Sankey through his investigation firms, the Sankey Firm and Sankey Investigations, Inc. conspired with Taitz to destroy Liberi and violated every privacy protection law; State and Federal laws for the disclosure, posting, and transmitting a person's Social Security number and personal identifying information; and violated the permissible purpose rule. In so doing, Sankey through his investigation firms, the Sankey Firm and Sankey Investigations, Inc. just to mention a few, violated Liberi's First Amendment Rights to Privacy, First and Fourteenth Amendment pertaining to invasion of privacy, a right to be safe, etc. See below which is a copy of Neil Sankey's e-mails from the Sankey Firm and Sankey Investigations, Inc.

76. Neil Sankey, by his own admission received from Defendant Linda statements that Liberi had a long criminal record going back to the 90's and Liberi had been convicted of among other things, real estate fraud, falsification of police reports, manipulation of credit bureau reports, and counterfeiting of documents, which is completely false. Without bothering to investigate the information sent by Linda, Neil Sankey through his firms, the Sankey Firm and Sankey Investigations, Inc. sent an e-mail out with the false information as if it were true. Since this e-mail was sent Neil Sankey admitted to two [2] separate individuals that he did **not** investigate the information and could not verify it was in fact Liberi. See below.

From: Neil SANKEY
Subject: FW: LISA LIBERI etc
To: dr_taitz@yahoo.com
Date: Monday, April 13, 2009, 7:04 PM

Here is the Liberi stuff you requested. This is also what I sent to Bob Unruh
From: Neil SANKEY [mailto:nsankey@thesankeyfirm.com] Sent: Friday, April 10, 2009 10:01 AM To: Bob Unruh Subject: LISA LIBERI etc Bob here are some bare facts about Berg's assistant. See below and attachments I don't know how much of the story you have already, but is essentially about WHO she really is and the questions that unfortunately brings up about Berg. Call, if you need to, at your convenience. Neil Sankey Investigator & Consultant. THE SANKEY FIRM Simi Valley, California 93063 nsankey@thesankeyfirm.com 805 520 3151 818 212 7615 cell

(Addendum)

LISA RENEE LIBERI. Bn 5/28/1965. 462-45-xxxx, **XXX-XX-XXXX** (& others) According to the Police she was born COURVILLE and married a Richardson (Possible Alan Douglas Richardson, currently residing in Las Vegas .) IF it was the other way around, then the Courville is Bill Marshall Courville 11/10/61 of Houston , Tx. 457-71-x I have several SS#'s for her and a LOT of AKA's. Her real SS# is probably 462-45-xxxx. Most prominent otherwise are 563-60-xxxx, 572-17-x, 622-19-x She went BK in 2002 Her brother is probably Lawrence E Morris of Fontana and Rancho Cuc , CA . He was born 1/16/64 Her Husband, Brent J, a Parolee, I have not researched that. Is probably Brent J McCormack 563-77, also uses 331-02-x There is also a Jerry HELLER and Douglas Cramer look interesting, but where do you stop?.

From: Neil SANKEY Subject: Bergs PayPal To: dr_taitz@yahoo.com Date: Monday, April 13, 2009, 7:15 PM It comes as no surprise to learn that the link to a Visa donation to Berg, (as opposed to PayPal) has been removed. Neil

79. Sankey through his investigation firms, the Sankey Firm and Sankey Investigations, Inc., did not have a permissible purpose to obtain Liberi's Social Security number or any other personal identifying information of Liberi.
80. Moreover, Taitz did not have a permissible purpose to obtain or receive Liberi's Social Security number and personal identifying information. This was nothing more than a complete libel/slander and invasion of privacy not to mention it violated state and federal laws.

81. Furthermore, Sankey through his investigation firms, the Sankey Firm and Sankey Investigations, Inc., did not have any permissible purpose to disclose Liberi's Social Security number to any third parties including a Reporter with World Net Daily.
82. In so doing, Sankey through his investigation firms, the Sankey Firm and Sankey Investigations, Inc., have severely endangered Liberi, her son and husband. Liberi was given a confidential address as a result of her and her son being victims of domestic violence. Sankey, through his investigation firms, the Sankey Firm and Sankey Investigations, Inc., have now disclosed Liberi's private personal information, full Social Security number, date of birth and where she lives and has allowed said information to be posted all over the internet by Taitz and sent across the United States and Internationally, by Taitz own admission.
83. Sankey through his investigation firms, the Sankey Firm and Sankey Investigations, Inc., conspired with Taitz to ensure Liberi's life was endangered and ruined. Sankey was well aware of Taitz threat to destroy Liberi to get to Berg and his law practice.
84. Sankey through his investigations firms, the Sankey Firm and Sankey Investigations, Inc., had a duty to abide by the California privacy laws. Because Sankey through his investigation firms, the Sankey Firm and Sankey Investigations, Inc., failed to ensure Taitz had a permissible purpose, which she did not, the fact Sankey himself distributed Liberi's Social Security number and private personal identifying information through e-mail to a Reporter and Taitz, since Sankey and his investigation firms failed to ensure and sign a contract with Taitz and the Reporter with World Net Daily to ensure the confidentiality of Liberi's Social Security

number, date of birth, and other private personal identifying information, he is liable for all the mass e-mailing Taitz did as if he sent the e-mails personally.

VI. FACTUAL ALLEGATIONS RELATING TO DEFENDANTS' JAMES SUNDQUIST and ROCK SALT PUBLISHING

85. Plaintiffs incorporate by reference all of the foregoing allegations as if set forth herein at length.

86. James Sundquist through his company, Rock Salt Publishing, accessed Ostella's home address and began sending mass e-mailing with her private confidential information to an unknown number of undisclosed recipients. In so doing, Sundquist through Rock Salt listed Ostella's phone number as his personal phone number in order to entice people to call and harass Ostella. The original e-mail from James Sundquist at Rock Salt Publishing is below, however, the X's placed were done so to protect Ostella and are replacements from the actual address and phone number. The X's were not part of the original e-mail and only added as this complaint will be public record.

From: "James Sundquist" <rock.salt@verizon.net>
Subject: re Lisa Ostella
Date: Tue, April 21, 2009 6:40 am
To: contact@nbro.us, info@breederville.com

Dear Tom O'Neill & North Brunswick Republican Organization and Breederville Director,

I need to alert you to the fact that Lisa Ostella has defrauded Dr. Orly Taitz and has hijacked her website. I have just spoken at length to Dr. Taitz. You can call her to verify this. Dr. Taitz tel number is 949-683-5411.

I live in New Jersey and have written two books and have a massive database in which I am able to expose what Lisa Ostella did to Dr. Orly Taitz, including approximately a thousand radio stations which I frequent as a guest.

Ms. Ostella's address and tel # are:

Ostella, Lisa
breederville.com
XXXXXXXXXXXXXXXXXXXX
North Brunswick, New Jersey 08902
United States

Sincerely,

James Sundquist
Director
Rock Salt Publishing
(732) xxx-xxxx

87. Sundquist through his company Rock Salt filed false police reports with the Brunswick, New Jersey FBI and local authorities falsely accusing Ostella of hijacking Taitz's websites and diverting funds from Taitz's PayPal accounts.

88. Sundquist, through his company Rock Salt, posted on Taitz's website, onlytaitz.com, that Ostella had hijacked Taitz's website and was diverting Taitz's PayPal funds and that he had reported to the Brunswick, New Jersey FBI and local authorities. In addition, Sundquist, through his company Rock Salt, also posted Ostella's home address and telephone numbers.¹⁴

Dr. Orly Taitz Esquire
Defend Our Freedoms Foundation 26302 La Paz ste 211, Mission Viejo CA 92691 Copyright 2009

Official Blog of Dr. Orly Taitz Esquire
April 22nd, 2009

Welcome to the OFFICIAL Dr. Orly Taitz Esquire blog.

Please Note: I am NOT using PayPal anymore at this time for donations,

Please mail your donations to:

Defend Our Freedoms Foundation

26302 La Paz ste 211

Mission Viejo CA 92691.

e-mail: dr_taitz@yahoo.com

From James Sandquist, director of Rock Salt Publishing
April 23rd, 2009

¹⁴ <http://www.onlytaitzesq.com/blog1/?p=246>

Fwd: Lisa Ostella Internet Fraud in North Brunswick, NJ

Thursday, April 23, 2009 6:44 AM

From:

"James Sundquist" <rock.salt@verizon.net>

[View contact details](#)

To:

"Orly Taitz" <dr_taitz@yahoo.com>

Begin forwarded message:

From: James Sundquist <rock.salt@verizon.net>

Date: April 23, 2009 9:39:46 AM EDT

To: askconsumeraffairs@lps.state.nj.us

Subject: Lisa Ostella Internet Fraud in North Brunswick, NJ

Dear Director of Consumer Affairs and the FBI for New Jersey,

You should be alerted to the following report regarding North Brunswick resident Lisa Ostella.

Because this also involves interstate commerce, the FBI needs to know about this too!

I need to alert you to the fact that Lisa Ostella has defrauded Dr. Orly Taitz and has hijacked her website. I have just spoken at length to Dr. Taitz.

You can call her to verify this. Dr. Taitz tel number is 949-683-5411.

WORLDNETDAILY has just run a national story on this:

<http://www.wnd.com/index.php?fa=PAGE.view&pageId=95555>

I live in New Jersey and have written two books and have a massive database in which I am able to expose what Lisa Ostella did to Dr. Orly Taitz, including approximately a thousand radio stations which I frequent as a guest.

Ms. Ostella's address and tel # are:

Ostella, Lisa

breederville.com

xxxxxxxxxxxxxx

North Brunswick, New Jersey 08902

United States

I hope that you will do what you can do to warn your community about Lisa Ostella!

Sincerely,

James Sundquist

Director

Rock Salt Publishing

<http://rock-to-salt.cephasministry.com/>

89. Sundquist, through Rock Salt, is known to make terrorist threats through the internet against individuals in order to intimidate them and scare them on behalf of others when the individuals do not agree in their cause and/or stand up for themselves.

90. Sundquist, through his Company Rock Salt, Taitz and Defend our Freedoms Foundation, Inc., have placed Ostella in fear for her children and family. Moreover, Sundquist, through his company Rock Salt, Taitz and Defend our Freedoms

Foundation, Inc., have caused Ostella and her family to be harassed and have placed their lives in danger. Ostella and her family have been repeatedly harassed by individuals on behalf of Taitz, Defendant our Freedoms, Sundquist and Rock Salt.

91. Sundquist, Rock Salt, Taitz and Defend our Freedoms Foundation, Inc. are well aware Ostella has never “hacked” anything and their reports are all falsified. They are well aware Taitz and Defend our Freedoms Foundation, Inc. have never been hacked. Instead, it is Taitz and her associations on her behalf who have installed JS Kit software which is a “hacking” and “tracking” software on Taitz’s Defend our Freedoms Foundation, Inc. in order to “track” and “hack” individuals and their computers who have visited Taitz and Defend our Freedoms, Inc. websites and blogs.

**VII. FACTUAL ALLEGATIONS RELATING TO LINDA SUE
BELCHER a/k/a LINDA S. BELCHER a/k/a LINDA STARR a/k/a
NEWWOMENSPARTY a/k/a STITCHENWITCH a/k/a EVA
BRAUN a/k/a WEB SERGEANT a/k/a KATY a/k/a
WWW.OBAMACITIZENSHIPDEBATE.**

92. Plaintiffs incorporate by reference all of the foregoing allegations as if set forth herein at length.
93. Defendant, Linda contacted Berg in or about August 2008 regarding the questions into Barack H. Obama’s citizenship status. Berg and his staff investigated the Mr. Obama’s citizenship and found there were genuine questions as to his Constitutional qualifications to run for and serve as President of the United States.
94. Due to some unauthorized credit card charges by Geoff Staples, double billing and failure to maintain Berg’s website, in or about November 2008, Berg fired Geoff Staples as webmaster and hired another third party, Gail Fry, to take over the website. Due to the expense involved, Linda was allowed to be a moderator.

95. In or about the end of January 2009, Linda began causing the webmasters and administrators problems with Berg's website. Linda was warned to calm down numerous times, however failed to comply. Linda felt she was in charge of Berg's website and sent e-mails to the website moderators deterring anyone from contacting Berg, Berg's assistant or the webmaster. Linda even stated she was in charge. As a result, Linda's moderator status was removed. However, she was still capable of posting on the blogs at obamacrimes.com.
96. In or about early February 2009, Berg on behalf of Adams had all the Defendants herein served with a cease and desist in attempts to stop the Defendants from their illegal and dangerous behaviors against and towards Adams.
97. Linda began posting on Berg's blog that individuals who were assisting with Berg's website were hacking Berg's website. Linda even posted on the blog a third party blog called Politijab had hacked Berg's site. All of this was unfounded and untrue.
98. In or about the end of February 2009, Linda called Berg's assistant and asked her to attend a conference call. Berg's assistant, Lisa, told Linda she was not available to call Berg. Linda called Berg and called Lisa back excited that Berg had agreed. During the conference call, Berg gave out his e-mail address and told folks with questions they could e-mail him. Berg hung up the call. One individual mentioned he had some important material to send to Berg, Linda immediately stated "send the e-mail to me at newwomensparty@aol.com and I will make sure Berg gets it. Linda told the caller not to send it to Berg's e-mail address." Berg never received the e-mail.

99. On or about March 4, 2009, Linda began calling all the webmasters, moderators and past volunteers of Berg's website telling them that Lisa, Berg's assistant was a liar, she was deleting Berg's e-mails and phone messages, no one could reach Berg and slandering Berg's assistant, she was hostile with some and harassing others. Berg and his staff received numerous complaints regarding Linda's unacceptable behaviors. Berg's assistant stated she would quit, as the false rumors of Linda's were not helping the cause. Berg cut all ties with Linda at that time.
100. On or about March 6, 2009, Linda continued her unacceptable behaviors, badmouthing Lisa, Berg's Assistant, badmouthing and slandering Berg, harassing people from Berg's blog, etc. Linda made derogatory remarks about Berg and Berg's assistant, Lisa, on Berg's website blog. Linda's last post was:

Re: Weekly Discussion Topics 03/01/09 - 03/07/09

by **Linda Starr** on Today, 23:23

I am done with all the lies, false accusations, trashing and vicious crap that has been done to me since January by certain people around here. They tell me my services are no longer needed and I am not welcome here. I spent all these months doing nothing but working my butt off for Phil and this cause and I'm out. No explanations except for more lies told about me...and Phil won't even talk to me after over a 10 year friendship!! How's that one? Lisa wants the trolls to take over and everyone knows Phil jumps to her tune, or so she tells it.

101. As a result, Linda was completely banned. Before being banned, Linda took Berg's blog database of e-mail addresses. After being banned, Linda sent the following e-mail out via her newwomensparty@aol.com e-mail address as a mass mailing on several different dates to hundreds of people including Berg's Expert Witnesses, Berg's supporters, attorney's Berg works with on other cases, Berg's

contributors, Defendants Orly Taitz, Mr. & Mrs. Hale, etc. only a few are attached for this Honorable Court's review:

Original Message -----

From: Newwomensparty@aol.com

To: newwomensparty@yahoogroups.com

Sent: Saturday, March 07, 2009 1:26 AM

Subject: I am sorry to tell you all...

but my affiliation with Obamacrimes.com and Phil J Berg has come to a unhappy parting of the ways. I cannot abide the lies, false accusations and trashing of me when I discovered some less than honest dealings were going on. One lie after another has been told to me and about me! I have given this cause and Phil everything in my being since last July, when my research really began in June.

Maybe in a few days I will be able to talk about it, but my stomach is churning tonight and I am heartbroken at the betrayal of me after a 10 + year friendship was ended tonight, where Phil was not even willing to listen to me or even tell me what it is I am supposed to have done, this time. I will try to make a more complete statement in a day or two.

I am certain that Barry Soetoro is not a US citizen, but we need people with more integrity to pursue this cause.

Linda Starr

Founder, New Womens Party

Feminism: (noun) the radical notion that women are people.

Well behaved women seldom make history!

--- On Sat, 3/7/09, Newwomensparty@aol.com

[<Newwomensparty@aol.com>](mailto:Newwomensparty@aol.com) wrote:

From: Newwomensparty@aol.com

[<Newwomensparty@aol.com>](mailto:Newwomensparty@aol.com)

Subject: Re: Fw: I am sorry to tell you all...

She didn't like it that I could reach Phil and she wanted to shut off that line of communication. I got him on your call and she didn't like that at all. And the fact that I defied her and did it anyway ticked her off a lot. She wants all the attention I am guessing. I found out things about her that were just awful from Kat who quit 3 days ago.

She wouldn't say what she found, she told me to do a search for "Lisa Liberi" maiden name of Richardson out of NM formerly of San Bernadino, CA

An honest person doesn't stand a chance against a lying charlatan.

Linda Starr
Founder, New Womens Party

Feminism: (noun) the radical notion that women are people.
Well behaved women seldom make history!

--- On Sat, 3/7/09, Newwomensparty@aol.com
<Newwomensparty@aol.com> wrote:

From: Newwomensparty@aol.com <Newwomensparty@aol.com>
Subject: Re: Fw: I am sorry to tell you all...

No one can reach him. she controls all his e-mail and all his phone messages. she deletes what she doesn't want him to see or hear.

Linda Starr
Founder, New Womens Party

Feminism: (noun) the radical notion that women are people.
Well behaved women seldom make history!

Newwomensparty@aol.com <Newwomensparty@aol.com>
wrote:

From: Newwomensparty@aol.com <Newwomensparty@aol.com>
Subject: Re: Fw: I am sorry to tell you all...

I shouldn't tell you what Kat found out about her and told me to search for today. It is shocking, but there is a problem with MY credibility? This explains why she doesn't become

a licensed attorney in her own right. Convicted felons can't. Do NOT let either Phil or Lisa know I told you about this. No telling what that nut would do to me or my family.

Mortgage Fraud Blog - New Mexico Woman Sentenced in Identity Theft and Real Estate Fraud

Thursday, April 10, 2008

New Mexico Woman Sentenced in Identity Theft and Real Estate Fraud

Lisa Liberi, aka **Lisa Richardson**, 42, New Mexico, was sentenced in connection with felony charges involving identity theft and forged documents. **Liberi** appeared in San Bernardino County, Rancho Cucamonga, Superior Court, on March 21, 2008. She was sentenced to a state prison term of 8 years, imposed but stayed, and placed on supervised probation for 3 years as part of a plea agreement. **Liberi** was sentenced on ten felony counts ranging from Grand Theft, Forgery, and Filing False Documents.

From 2000 to 2004, **Liberi** engaged in a complex fraud involving falsification of police reports, manipulation of credit bureau reports, loan fraud, and counterfeiting of court documents resulting in hundreds of thousands of dollars in losses to banks and credit unions.

In 2002, San Bernardino County Sheriff's Department personnel arrested **Liberi** on theft by false pretense charges. In July 2004, Investigators from the San Bernardino County District Attorney's Real Estate Fraud Unit arrested **Liberi** at the Ontario International Airport for additional felony charges while she was out on bail.

~~Mortgage fraud~~

Linda Starr

Founder, New Womens Party

Feminism: (noun) the radical notion that women are people.
Well behaved women seldom make history!

From: Newwomensparty@aol.com <Newwomensparty@aol.com>

Subject: New site www.ObamaCitizenshipDebate.com

To: newwomensparty@yahoogroups.com

Date: Wednesday, March 18, 2009, 6:45 PM

As you've probably noticed, there have been changes to the OC Board discussions lately. Everything from additional Agents, to subtraction of Agents and members, to Obots being allowed back to the board and to be placed into positions of trust as Moderators/Agents. A lot has been going on behind the scenes, as well as on the OC board itself.

I'm sure you're not happy with what's going on. We aren't, either. It's counter productive to having discussions, when you're busy rehashing 6 month-old arguments with people who are purposely derailing every discussion. So a group of us got together, including former Moderators/Agents, and decided it was time to do our own thing.

We've decided to create our own board. It will be an atmosphere that is Obot-FREE. Our core group want nothing more than Justice for the usurper in our Office. We can have flowing discussion, like we had before the changes at OC. Also, there may be some pleasant surprises in store, on the new board. Surprises that will definitely be a HUGE benefit for this cause. We aren't limiting ourselves to discussions of any one attorney or effort. We want to raise public awareness of all the efforts to expose the truth and remove the Usurper from office.

We'd like to have you join us at our new site, if you are interested in truth and justice. Please invite others to join, but only invite those who you're SURE are with US, not THEM. This will ensure progress in our daily discussions. We are implementing a screening process to insure only like minded individuals are accepted into our ranks. Welcome to our friends.

Thanks.

The Administration Team at ObamaCitizenshipDebate.com

Linda Starr

Founder, New Womens Party

Feminism: (noun) the radical notion that women are people.

Well behaved women seldom make history!

to Lisa
Liberi Liberi@libertyjournal.com
date Mar 20, 2009 9:48 PM
subject ...
mailed-by

Lisa, below is the e-mail Linda sent to Amboy Duke, the guy she thinks is

Ted Nudgent. Amboy Duke is not Ted Nugent but someone from another blog.

Thank you for responding. I am glad to hear from you again. I was beginning to think you got frustrated and quit. I have a new effort and site that is very exciting to a lot of people who are following me, having gotten disgusted with Phil.

We just got the new site up and plan to raise public awareness for all the cases. This way I have not publicly gone against Phil, whose efforts I truly do not want to harm, or diminish his chances to win any of his cases. He deserves credit for all his hard work when he was the only one willing to take action and the first to file suit. He has worked tirelessly, but unfortunately, he won't win because there is a serious problem with Lisa and Barry's people are going to hurl it out in the court and that'll be it for all the cases.

Berg supporters know something very bad happened to make me leave (which it did), but I do not intend to make it a public issue. Many of them did and a lot of people left and convinced me to do my own campaign and are following me now. It's because I was accused of terrible things by Lisa that are simply not true and I defended myself, but only with a handful of people. Phil believed her and I was forced out. Then he wrote me another nasty e-mail basically trying to intimidate me into silence about Lisa, which wasn't necessary because I wasn't the one who exposed her issues as I was accused of doing. I didn't even know it, but she has some major credibility problems that I don't want to get into.

We believe our time is better spent raising public awareness for the efforts of everyone. Phil shouldn't be slamming Orly Taitz just because she's making a lot of noise and getting a lot of attention. I told him not to be slamming her, but now that I'm forced out, he is listening to Lisa. It looks like sour grapes. My role was both cheerleader and attack dog since I could do that as a volunteer.

Lisa has allowed trolls to take over and even become moderators. I don't know if she's getting blackmailed by them or what, but it's a very toxic environment and people just don't want to be there, and that includes financial supporters who wonder now how their donations have been spent. It got so bad that you saw the results when you kept asking questions. And it's was never that way before. Posters welcomed the chance to answer questions. My site will be like that and we will have a section that isn't up yet, to list the facts and answer most of the pertinent questions. You will be able to go to one place and get answers without having to sort through 1000's of blogger posts.

I used to be a guest on a lot of radio shows talking about my findings exposing various scandals and crimes. I am going to start doing that again to reach a larger audience. Me and the others who came with me to start this new effort feel that if we can raise the public awareness to a level that 100 million people are demanding Barry produce the proof, or that the DOJ arrest and remove him to prosecute for all his many crimes in illegally usurping office as POTUS.

My efforts will not conflict with Phil's, but I feel compelled to say, please don't get involved with him. I no longer trust Phil or his Judgment after he was willing to listen to outright lies about me made by Lisa. You don't throw someone under the bus after being friends for more than 10 years, especially not your main cheerleader who fires people up to support the cause. Like I said before, this is no catfight. It's a major integrity issue. Lisa is a pathological liar and it really pains me to say that, but it's true. I can't, in good conscience, possibly recommend you get involved with Phil after what I learned. I don't want to say more in writing.

In answer to your second e-mail, no one contacted me on your behalf. And if someone does, I will answer their questions in detail. I have enough knowledge to do that and speak coherently on the subject. In fact, I have been doing that all along except for a few legal questions. Now I know the answers so we don't necessarily need anyone else to answer. I am raising funds to wage a media campaign to raise public awareness, buying media ads and such. And if you decide to help us, you will know exactly what we are doing. My site is moving to another server today that is a better place for our bloggers and security. My site is going to be bigger than Phil's because a lot of the supporters who had another favorite and scattered when their efforts failed, will join me and we'll support them
ALL.

I look forward to speaking to you or someone on your behalf soon.

Linda Starr

Founder, New Womens Party

Feminism: (noun) the radical notion that women are people.
Well behaved women seldom make history!

102. On March 7, 2009, Linda called the office and left a message for Berg stating “Lisa is sending vial things out about me, she is bad mouthing me, she is deleting my e-mail to you and she sent me e-mails admitting it.” Knowing the entire time these were all lies and fabricated stories.

103. Linda called Berg and told him his Liberi had a criminal record and was stealing Twelve Thousand [\$12,000.00] Dollars per month from Berg’s PayPal account and was sending “vial” things around the internet about Linda. Linda went on further stating Liberi had a criminal record going all the way back to the 1990’s, all of which Linda knew was false. Berg told Linda to send him an e-mail with all these e-mails attached. Berg then called Liberi and asked for the same thing. Liberi sent Berg thirty-seven [37] pages. Linda sent nothing.

104. As time went on, Berg sent e-mails to Linda asking for her list. Berg finally received another nasty e-mail about Lisa stating Lisa didn’t like what Linda had sent on Thursday so Lisa deleted it. Berg asked Linda numerous times to resend the “supposed” e-mail, Berg never received anything. Instead, Linda blocked Berg’s e-mail address.

105. Linda sent the same accusations outlined above via e-mail to a private investigator named Neil Sankey with The Sankey Firm and Sankey Investigations, Inc. Instead of investigating the information Sankey e-mailed the information along with Liberi’s Social Security number, date of birth and where she lived to a Reporter at World Net Daily and to Orly Taitz. [see above under “Factual Allegations pertaining to Orly Taitz, et al” and Factual Allegations pertaining to Sankey, et al.”]

106. Linda’s behaviors continued and she then began contacting moderators on Berg’s website blog. Linda was attempting to lure all of Berg’s moderators over to her new

website. Linda was also attempting to steal Berg's supporters. It was later discovered Linda was in fact the individual with an extensive criminal record dating back to 1992 through 2007 for Theft, Fraud, and Fraud by Check, etc., according to the Texas Department of Public Safety and according to a criminal background check run on her by her Social Security number.

VIII. FACTUAL ALLEGATIONS RELATING TO EDGAR (ED) HALE, CAREN HALE, PLAINS RADIO NETWORK a/ka/ PLAINS RADIO NETWORK, INC. a/k/a PLAINS RADIO, a/k/a BAR H FARMS and KPRN AM 1610

107. Plaintiffs incorporate by reference all of the foregoing allegations as if set forth herein at length.
108. Defendants, Mr. and Mrs. Hale began operating a radio program, Plains Radio, through a tower, which they own, KPRN. The Radio show is an internet radio show that is broadcast through different stations. Plains Radio also has a website and chat room located at plainsradio.com. that Mr. and Mrs. Hale worked.
109. In or about June 2008, Mr. and Mrs. Hale contacted Evelyn Adams and requested she co-host their radio shows on Plains Radio Network, an internet radio show. Mrs. Adams quit and left Plaintiff's radio show on or about August 21, 2008. Defendants Hale banned Mrs. Adams computer IP address from his website located at <http://www.plainsradio.com>, thus Adams could **not** access his website at all as she was permanently banned.
110. Shortly thereafter, Adams began hosting another show, Momma E Radio Rebels and co-hosted shows on Monks Media. Once Adams began with her own show, Defendants Mr. & Mrs. Hale began slandering Adams name on their radio show,